Appendix L
WAG 9 New Site
Indentification Forms

APPENDIX L
NEW SITE IDENTIFICATION FORMS

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Site that has been remediated since the start of the OU 9-04 Comprehensive RI/FS

- ANL-61A PCB Removal of Soil Remaining in ANL-61.

Sites Identified in EG&G Environmental Baseline Survey -1994

- Site 26 - Buried construction debris north of Argonne.
- Site 27 - Possible snow melt chemical dump north of ANL off power line road.
- Site 28 - Buried rubble outside the Argonne fence.
- Site 120 - Rubble pile north of TREAT.

ANL-61A PCB Removal of Soil Remaining in ANL-61.

ATTACHMENT B

NEW SITE IDENTIFICATION FORM

Part A (to be completed by observer)

1. Person initiating report: Scott Lee Phone: 533-7829 Designated contractor WAG Manager: Pete Wells Phone: 533-7152
   Date initiated: 9-23-97

2. Site Title: ANL-61A (Remaining PCB contaminated soil from ANL-61 (Track 1 site)

3. Describe the conditions observed that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition, and date observed. A location map and/or diagram should be included to help with the site visit.

This area is an extension of PCB contaminated soil from the ANL-61 Transformer Yard that was identified during the collection of verification samples. The PCB contamination was detected near a 3,000 gallon underground diesel tank. The area of PCB contamination was bounded on two sides by the building, one side by the tank, and on the last side by clean verification samples. The pending cleanup of the PCB's was delayed until the removal of the 3,000 gallon underground tank. The 3,000 gallon tank was scheduled for removal in fiscal year 94 and is being removed because of the Underground Storage Tank (UST) regulations. The Track 1 for ANL-61 signed by the EPA and IDHW regional project managers stated that the remaining PCB contaminated soil would be cleaned up concurrently with the removal of the 3,000 gallon UST.

Part B (to be completed by Contractor WAG Manager)

4. Recommendation:

_____ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the FFA/CO Action Plan. Proposed OU assignment is included in the FFA/CO. OU_____.

__X__ This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation, and should NOT be included in the FFA/CO Action Plan.

5. Basis for the recommendation:

See the attached summary of the removal of the PCB contaminated soil and the 3,000 gallon underground storage tank.

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in section 4 above.

Name: P.B. Wells Signature: P.B. Wells Date: 9/29/97

Part C (to be completed by DOE WAG Manager)

7. DOE WAG Manager Concurrence:

✓ Concur with the recommendation.
____ Do not concur with the recommendat on. Explanation follows:

Name: William G. Bass Signature: William G. Bass Date: 9-29-97

FFA/CO Project Managers' concurrence/non-concurrence will be documented in the tele-conference meeting minutes.

Project Summary : PCB Removal at ANL-61A

This document is intended to provide appropriate documentation for the OU 9-04 RI/FS of the cleanup of ANL-61A. In addition, this document also provides results of verification sampling to the EPA and IDHW Waste Area Group 9 (WAG 9) managers.

This report is separated into four sections. The first section is a brief summary of background information for ANL-61 and ANL-61A. The second describes activities conducted during the removal of the contaminated soil. {Cleanup of ANL-61A involved remediation of an area contaminated with polychlorinated biphenyls (PCBs).} The third summarizes verification sample results and compares these to the limiting soil concentrations for PCB contaminated soils in ANL-61A. The last section details disposal of PCB contaminated soil removed from ANL-61A.

Background Information

Four transformers containing approximately 2,842 gallons of askarel, a mineral oil which is about 50% PCBs, were located in the Transformer Yard located south of the EBR-II Power Plant (Building 768). This area was identified in the Federal Facility Agreement and Consent Order (FFA/CO) as ANL-61. During replacement of the transformers in 1988 prior leakage from the transformers was discovered. Sampling and cleanup of ANL-61 was conducted in 1988 and 1992.

Verification samples collected in 1992 revealed that an area of PCB contamination remained in an area east of ANL-61 near a 3,000 gallon underground storage tank. A Track 1 document was prepared for ANL-61. It recommended No Further Action so long as the remaining PCB contamination was removed. The Track 1 document was signed by the Environmental Protection Agency (EPA) and Idaho Department of Health and Welfare Regional (IDHW) Project Managers. The ANL-61 Track 1 document stated that the PCB contaminated area by the 3,000 gallon underground storage tank (designated ANL-61A) had been contaminated with PCBs prior to 1978 and would be remediated in 1995. After discussions with the EPA and IDHW WAG 9 managers, it was decided that the PCB contaminated soil in ANL-61A could be left in place until the tank was removed (prior to December 22, 1998 - to satisfy the UST regulations). This project summary documents completion of the ANL-61A PCB removal identified in the signed ANL-61 Track 1 document.

The cleanup of ANL-61A was carried out as a CERCLA "housekeeping removal action" as a best management practice. This spill is assumed to have occurred prior to May 4, 1987 and is classified by the TSCA regulations as an "old PCB spill". EPA determined that old spills require site-by-site evaluation (52 Federal Register 10688) and are excluded from the scope of the TSCA PCB Spill Cleanup Policy. The required cleanup levels for the PCB contamination in ANL-61A were determined using backward calculation of the limiting soil concentrations for future residential intrusion and ingestion scenarios. These limiting soil concentrations used the 1 E-04

Risk for two soil depths, soils located between the surface to a depth of 10 feet and soils deeper than 10 feet. The limiting soil concentrations for PCBs were 10.91 mg/kg, for soils between 0 and 10 feet (residential intrusion) and 78.57 mg/kg, for soils deeper than 10 feet (residential groundwater ingestion).

Summary of Removal Activities

This project involved two remediation projects, an underground storage tank removal and remediation of an area containing PCB contaminated soil. During the tank removal portion of the project 76,960 pounds of soil was removed from the site, loaded into rolloff containers, and ultimately shipped to a TSCA disposal facility for disposal. Following completion of the underground storage tank removal, a contractor was hired to complete the PCB soil remediation.

The PCB remediation project began on August 11, 1997. A 9' x 25' area which extended to basalt was cleared of all soil, the boundaries were sampled to verify cleanup levels for the PCB contamination were met, a 2" bentonite layer was placed on the basalt, and the area was backfilled and compacted. Actual site work was completed on August 29, 1997. During this period 525,470 pounds of soil was removed from the site, loaded into rolloff containers, and shipped to a TSCA disposal facility for disposal.

Verification Sample Summary

The attached sample analysis summary table includes information for PCB analysis results as well as diesel tank remediation analyses results. These two remediation projects were performed concurrently, but different verification analyses are needed for each activity. The closeout report for the diesel tank removal portion of the project was issued under an internal memo (AEP-97.28).

On the attached summary table, analysis results for the PCB verification samples are shown in two columns, depending on the depth of the sample. One verification sample collected at 0-10 feet contained a PCB concentration of 11 mg/kg which was above the limiting soil concentration, for soils between the surface and 10 feet, of 10.91 mg/kg. The reasonable maximum exposure (RME) value was calculated for verification samples collected in all soils in the surface to 10 feet depth range. This RME value was determined by taking the upper one tailed 95% value of the Upper Confidence Limit of the mean (UCL). The 95% UCL value for the surface to 10 feet soil concentration was determined to be 1.99 mg/kg as shown in the second attachment. Since the 95% UCL value (1.99 mg/kg) was less than the limiting soil concentration of 10.91 mg/kg, no further excavation of remaining soils was required. Soils at depths greater than 10 feet also did not require further remediation for PCB contamination; none of the samples exceeded the limiting soil concentration of 78.58 mg/kg. Thus, the PCB soil concentrations in ANL-61A are below the respective limiting soil concentrations for the future residential intrusion and the groundwater ingestion scenarios.

Table 3-1. OU 61 A PCB Cleanup Data Summary

Chemicals Of Concern:	PCBs	PCB (0-10 Feet Below Ground Surface)	PCB (10 Feet or Greater Below Ground Surface)	BTEX	Benzene	Toluene	Ethylbenzene	Xylenes (Total)	PAHs	Acenapthene	Anthracene	Benzo(a)pyrene	Benzo(a) fluoranthene	Benzo(k) fluoranthene	Benzo(a) anthracene	Benzo(g,h,i) perylene	Chrysene	Fluorene	Fluoranthene	Napthalene	Phenanthrene	Pyrene	Comments
Action Level (mg/kg):		10.9	78.57		0.06	5.4	10	7		1.1	0.8*	0.12	4.4*	0.12	1.22	0.4*	0.5*	4.2	4.4*	5.5	8.4	10*	* Soil saturation limit per RFP SOW
Sample Number	PCB Type																						
ANLC101	1260	4.7			ND<.003	0.01	ND<.003	ND<.003		ND	ND	ND	ND	ND	ND	ND	ND	ND	0.644	ND	ND	ND	
ANLC102	1260	<1.0			ND<.003	ND<.003	ND<.003	ND<.003		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
ANLC103	1260		<1.0		ND<.003	ND<.003	ND<.003	ND<.003		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
ANLC201	1260	2.3																					
ANLC202	1260	<1.0																					
ANLC203	1260		<1.0																				
ANLC204	1260		<1.0		ND<.003	0.004	ND<.003	ND<.003		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
ANLC301	1260	1.6																					
ANLC302	1260	1.7																					
ANLC303	1260		<1.0																				
ANLC401	1260	2.3			ND<.003	ND<.003	ND<.003	ND<.003		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
ANLC402	1260	<1.0			ND<.003	ND<.003	ND<.003	ND<.003		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
ANLC403	1260		<1.0		ND<.003	ND<.003	ND<.003	ND<.003		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
ANLE101		ND																					
ANLE102		ND																					
ANLE103			ND																				
ANLE201	1260	<1.0																					
ANLE202		ND<1.0																					
ANLE203			ND<1.0																				
ANLE301		ND<1.0																					
ANLE302		ND<1.0																					
ANLE303			ND<1.0																				
ANLE304		ND<1.0																					QA/QC Duplicate of ANLE302
ANLE305		ND<1.0			ND<.3	0.3	ND<.3	ND<.3		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	QA/QC Equipment Blank (ug/L)
ANLE306		ND<1.0			ND<.3	0.3	ND<.3	ND<.3		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	QA/QC Field Blank (ug/L)
ANLX101			ND<1.0																				
ANLX201	1260		ND<1.0																				
ANLX301		ND<1.0																					
ANLX401	1260	4.0																					
ANLX501	1260		<1.0																				
ANLX601	1260	<1.0																					
ANLX701	1260	11.0																					
ANLX801			ND<1.0																				
ANLX901			ND<1.0																				
ANLX1001	1260	<1.0																					
ANLX1101	1254	<1.0																					
ANLX1201		ND<1.0																					
ANLX1301	1260		16.4																				
ANLX1401	1260		<1.0																				
ANLX1501		ND<1.0																					
ANLX1502	1260	6.0																					QA/QC Duplicate ANLX1501
ANLX1503		ND<1.0																					QA/QC Water Equipment Blank (ug/L)
ANLX1601	1260	<1.0																					
ANLX1701		ND<1.0																					

Table 3-1. Sampling Results Summary.

<10 PCBs

		results mg/kg	1/2 u	ln		
c	101	4.7	4.7	1.547563	mg/kg	
c	102	1	0.5	-0.693147	mg/kg	nd
c	201	2.3	2.3	0.832909	mg/kg	
c	202	1	0.5	-0.693147	mg/kg	nd
c	301	1.6	1.6	0.470004	mg/kg	
c	302	1.7	1.7	0.530628	mg/kg	
c	401	2.3	2.3	0.832909	mg/kg	
c	402	1	0.5	-0.693147	mg/kg	nd
e	101	1	0.5	-0.693147	mg/kg	nd
e	102	1	0.5	-0.693147	mg/kg	nd
e	201	1	0.5	-0.693147	mg/kg	nd
e	202	1	0.5	-0.693147	mg/kg	nd
e	301	1	0.5	-0.693147	mg/kg	nd
e	302	1	0.5	-0.693147	mg/kg	nd
e	304	1	0.5	-0.693147	mg/kg	nd
e	305	1	0.5	-0.693147	mg/kg	nd
e	306	1	0.5	-0.693147	mg/kg	nd
x	301	1	0.5	-0.693147	mg/kg	nd
x	401	4	4	1.386294	mg/kg	
x	601	1	0.5	-0.693147	mg/kg	nd
x	701	11	11	2.397895	mg/kg	
x	1001	1	0.5	-0.693147	mg/kg	nd
x	1101	1	0.5	-0.693147	mg/kg	nd
x	1201	1	0.5	-0.693147	mg/kg	nd
x	1501	1	0.5	-0.693147	mg/kg	nd
x	1502	6	6	1.791759	mg/kg	
x	1503	1	0.5	-0.693147	mg/kg	nd
x	1601	1	0.5	-0.693147	mg/kg	nd
x	1701	1	0.5	-0.693147	mg/kg	nd

ncount	29	29
ave	1.52069	-0.164349
sdev	2.309202	0.934903
hstat		2.375167
		'ok

UCL	1.99834
ave	0.848446
max	1.547563

Scott Lee
9-24-97

Calculation of UCL
For Samples collected at depths ≤ 10 feet. to be acceptable needed to be Less than 10.9 mg/kg.

Sa Lee 9-15-97

>10 PCBs

		results mg/kg	1/2U	ln		
c	103	1	0.5	-0.693147	mg/kg	nd
c	203	1	0.5	-0.693147	mg/kg	nd
c	204	1	0.5	-0.693147	mg/kg	nd
c	303	1	0.5	-0.693147	mg/kg	nd
c	403	1	0.5	-0.693147	mg/kg	nd
e	103	1	0.5	-0.693147	mg/kg	nd
e	203	1	0.5	-0.693147	mg/kg	nd
e	303	1	0.5	-0.693147	mg/kg	nd
x	101	1	0.5	-0.693147	mg/kg	nd
x	201	1	0.5	-0.693147	mg/kg	nd
x	501	1	0.5	-0.693147	mg/kg	nd
x	801	1	0.5	-0.693147	mg/kg	nd
x	901	1	0.5	-0.693147	mg/kg	nd
x	1301	16.4	16.4	2.797281	mg/kg	
x	1401	1	0.5	-0.693147	mg/kg	nd

ncount	15	15
ave	1.56	-0.460452
sdev	4.105362	0.901225
hstat		2.590898
		'ok
	UCL	1.767739
	ave	0.630998
	max	-0.693147

Calculation of UCL for samples collected at depths > 10 feet. To be acceptable needed to be < 78.57; is 1.77.

Debris Disposition

Verification sampling associated with the previously mentioned 1992 ANL-61 cleanup action revealed PCB contamination remained in the area designated as ANL-61A. Two samples in the area contained PCB concentrations above the 1992 target cleanup level of 25 ppm. The concentrations in these two samples were 55 mg/kg and 39 mg/kg.

Soil, concrete, rags, and personnel protective equipment associated with the 1997 ANL-61A remediation were transported to U.S. Pollution Control Inc. - Grassy Mountain Facility (USPCI) for disposal. (USPCI is an EPA approved TSCA chemical waste landfill.) This was in compliance with EPA regulation 40 CFR 761.60(a)(4) "Any non-liquid PCBS at concentrations of 50 ppm or greater in the form of contaminated soil, rags, or other debris shall be disposed of by either:

(I) an incinerator which complies with 761.70; or
(ii) a chemical waste landfill which complies with 761.75."

Site 26 - Buried construction debris north of Argonne.

ATTACHMENT B

NEW SITE IDENTIFICATION FORM

Part A (to be completed by observer)

1. Person initiating report: Mona Dunihoo, Jim Lane Phone: 526-5231
   Designated contractor WAG Manager: Pete Wells Phone: 533-7152
   Date initiated: October 17, 1994

2. Site Title: Buried construction debris north of Argonne

3. Describe the conditions observed that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition, and date observed. A location map and/or diagram should be included to help with the site visit.

   Approximate legal description of this site is: T3N, R32E, Sec. 2. The dirt and vegetation in this area is disturbed, which is consistent with sites that have been excavated. This area contains several dirt mounds, containing partially buried rebar. Interviews with former Argonne employees indicate that this may be a construction debris pile. Besides the rebar, the EBS team found several piles of a white, granular substance suspected to be calcium chloride used to melt snow. This material appears to have been deposited over time, as some piles appear to have melted, while others look new. Vegetation in the immediate area of the granular material appears stressed. See Environmental Baseline Field Notes #26, attached map, and Environmental Baseline Photographs 94-948-1, frames 9-11, 94-856-1, frames 28-31, 94-856-2, frames 12-24, and 1997 ANL-W photos 9774e and 9775e.

Part B (to be completed by Contractor WAG Manager)

4. Recommendation:

   _____ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the FFA/CO Action Plan. Proposed OU assignment is included in the FFA/CO. OU_____.

   _X_ This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation, and should NOT be included in the FFA/CO Action Plan.

5. Basis for the recommendation:

   This site was identified by aerial reconnaissance conducted by representatives from EG&G for the Environmental Baseline Survey. ANL-W has conducted numerous walk-throughs of the area along with photographs, radiation surveys, and industrial hygiene monitoring. The area contained a few pieces of rebar, numerous large soil berms, and approximately 20 piles of solidified snow melt material (urea). The snow melt material was sampled and analyzed and all the piles were removed and disposed of in the CFA Landfill in 1994. According to interviews with the Material Handlers

Manager (Monte Windmiller) the soil berms are remnants of an old borrow pit used for construction materials for the EBR-II reactor. Thus, the soil berms are construction type wastes with no known hazardous wastes and are therefore excluded as a FFA/CO Waste Management Site as defined in Attachment C of the *Inclusion of New Sites Under the INEL Federal Facility Agreement and Consent Order* dated June 24, 1994. No regrading activities are planned for this site.

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in section 4 above.

Name: P.B. Wells Signature: P B Wells Date: 9/5/97

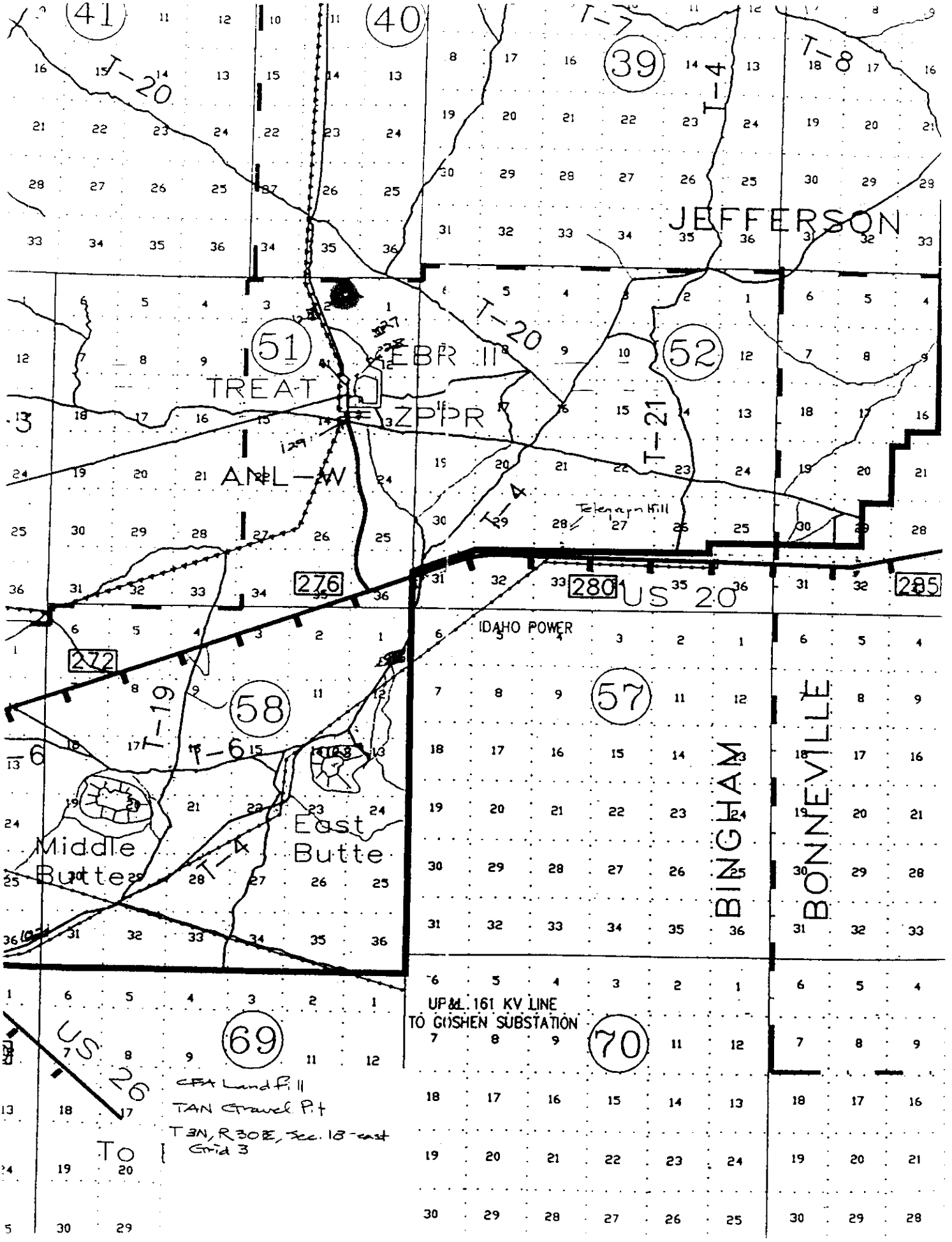
Part C (to be completed by DOE WAG Manager)

7. DOE WAG Manager Concurrence:

_✓_ Concur with the recommendation.
____ Do not concur with the recommendation. Explanation follows:

Name: William Gregory Boss Signature: W. Gregory Boss Date: 9-5-97

FFA/CO Project Managers' concurrence/non-concurrence will be documented in the tele-conference meeting minutes.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TREAT
EBR II
ZPPR
ANL-W
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276
280
285
US 20
IDAHO POWER
272
58
57
T-19
T-6
T-4
Middle Butte
East Butte
BINGHAM
BONNEVILLE
69
70
US 26
UP&L 161 KV LINE
TO GOSHEN SUBSTATION
CFA Land Ft II
TAN Gravel Pit
T 3N, R 30E, Sec. 18 - east
Grid 3
To

Site 27 - Possible snow melt chemical dump north of ANL off power line road.

ATTACHMENT B

NEW SITE IDENTIFICATION FORM

Part A (to be completed by observer)

1. Person initiating report: Mona Dunihoo, Jim Lane Phone: 526-5231
   Designated contractor WAG Manager: Pete Wells Phone: 533-7152
   Date initiated: October 17, 1994

2. Site Title: Possible snow melt chemical dump north of ANL off power line road.

3. Describe the conditions observed that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition, and date observed. A location map and/or diagram should be included to help with the site visit.

   Approximate legal description of this site is T3N, R32E, Sec. 12. Three areas along an old road between the ANL-W 771 facility and the power line access road contain an unidentified, white granular substance. The vegetation in the immediate area of the white granular material is stressed. The best guess is that this material is used to melt snow. See attached map and photograph 94-856-2, frames 20-23.

Part B (to be completed by Contractor WAG Manager)

4. Recommendation:

   _____ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the FFA/CO Action Plan. Proposed OU assignment is included in the FFA/CO. OU_____.

   _X_ This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation, and should NOT be included in the FFA/CO Action Plan.

5. Basis for the recommendation:

   This site was identified by aerial reconnaissance conducted by representatives from EG&G for the Environmental Baseline Survey. ANL-W has conducted numerous walk-throughs of the area along with photographs, chemical analysis, radiation surveys, and industrial hygiene monitoring. All together, four independent dump locations containing 47 separate piles were found in this area north of the ANL-W facility. Samples were collected of each of the 47 pile and submitted for analysis. The results indicated that 46 of the 47 piles were indeed urea fertilizer (nitrogen) and one pile was calcium chloride. Both of these materials have been used as ice melting

compounds for the sidewalks and steps at ANL-W. The piles (46) containing the urea along with the underlying soil was scooped up and disposed of at the CFA Landfill. The one pile of calcium chloride and the underlying soil was bagged and disposed of in an off-site landfill. All the wastes were removed from these four sites.

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in section 4 above.

Name: P.B. Wells Signature P B Wells Date: 9/5/97

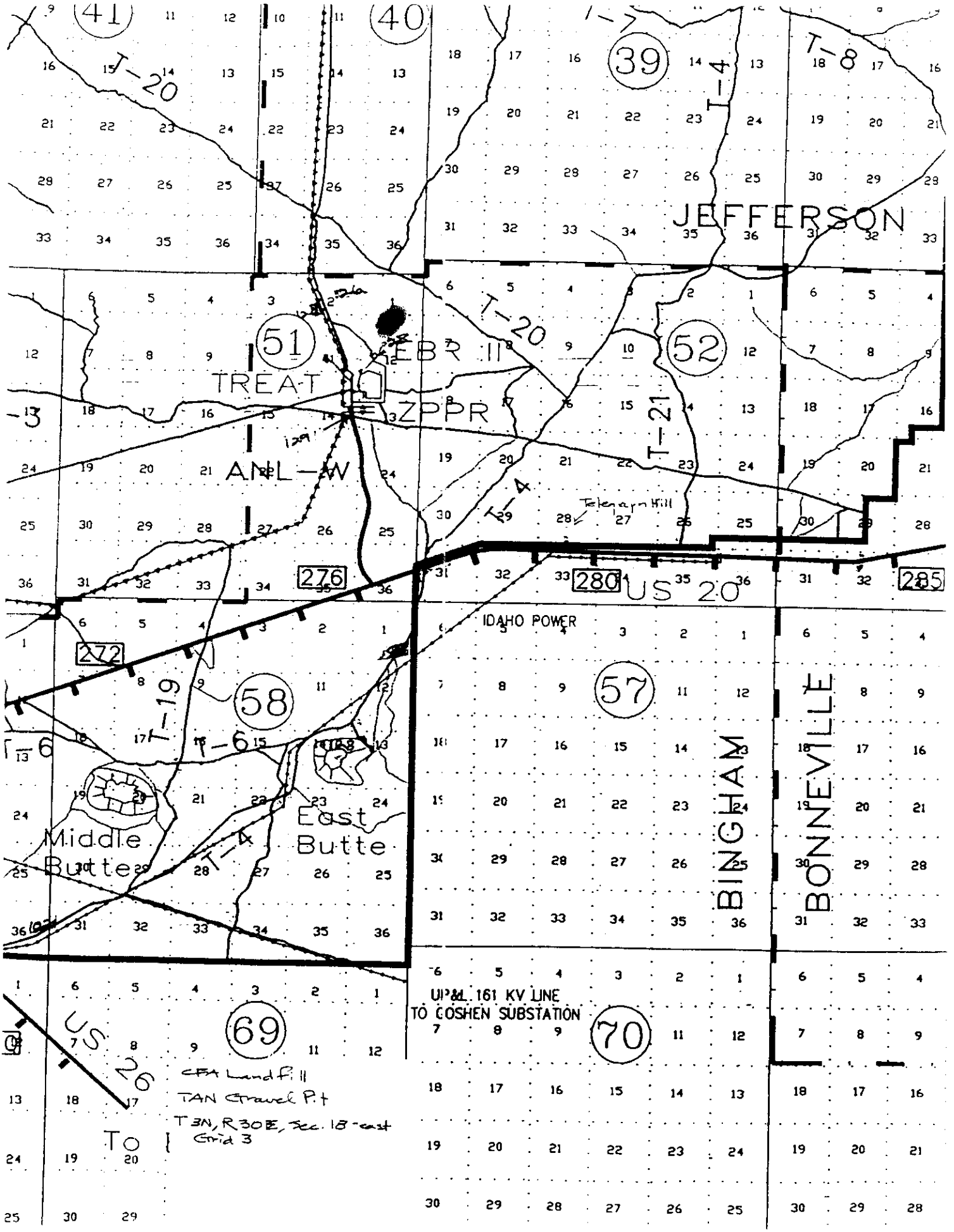
Part C (to be completed by DOE WAG Manager)

7. DOE WAG Manager Concurrence:

_✓_ Concur with the recommendation.
____ Do not concur with the recommendation. Explanation follows:

Name: William Gregory Boss Signature: W Gregory Boss Date: 9-5-97

FFA/CO Project Managers' concurrence/non-concurrence will be documented in the tele-conference meeting minutes.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T-4
T-8
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TREAT
EBR II
ZPPR
ANL-W
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Telegraph Hill
276
280
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285
IDAHO POWER
272
58
57
T-19
T-6
Middle Butte
East Butte
BINGHAM
BONNEVILLE
69
70
US 26
UP&L 161 KV LINE
TO GOSHEN SUBSTATION
CFA Landfill
TAN Gravel Pit
T3N, R30E, Sec. 18 - east
Grid 3
To

Site 28 - Buried rubble outside the Argonne fence

ATTACHMENT B

NEW SITE IDENTIFICATION FORM

Part A (to be completed by observer)

1. Person initiating report: Mona Dunihoo, Scott Lebow Phone: 526-5231
   Designated contractor WAG Manager: Pete Wells Phone: 533-7152
   Date initiated: October 17, 1994

2. Site Title: Buried rubble outside the Argonne fence

3. Describe the conditions observed that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition, and date observed. A location map and/or diagram should be included to help with the site visit.

   Approximate legal description of this site is T3N, R32E, Sec. 12. The area is void of natural old growth sagebrush vegetation and is located approximately 400 feet due north of the security fence surrounding the ANL-W 771 facility. The area contains old paint cans, caulking tubes, potential asbestos insulation and transite board, a gas can, what appears to be a secondary acid container, bagged trash, and four lead bricks. These items were on the ground or partially buried. The ground in the area is disrupted, indicating the potential for other items to be buried in the area. See attached map and Environmental Baseline Photographs 94-0856-2, frames 0-6, 94-948-1, frames 12-22, and 1997 ANL-W photos L9770e through L9773e.

Part B (to be completed by Contractor WAG Manager)

4. Recommendation:

   _____ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the FFA/CO Action Plan. Proposed OU assignment is included in the FFA/CO. OU_____.

   X This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation, and should NOT be included in the FFA/CO Action Plan.

5. Basis for the recommendation:

   This site was identified by aerial reconnaissance conducted by representatives from EG&G for the Environmental Baseline Survey. ANL-W has conducted numerous walk-throughs of the area along with photographs, radiation surveys, and industrial hygiene monitoring. The area contained numerous construction wastes including, electrical conduit, wire, scrap metal, clay tile, wood scrap, nuts and bolts, transite

scrap, and four 25-pound lead bricks. The lead bricks were removed and sent to an off-site clean lead recycler. All of the wastes that remain in the site appear to be old construction type wastes with no known hazardous wastes and are therefore excluded as a FFA/CO Waste Management Site as defined in Attachment C of the *Inclusion of New Sites Under the INEL Federal Facility Agreement and Consent Order* dated June 24, 1994. However, ANL-W has scheduled a cleanup of the site with the Plant Services Laborers for the first quarter of fiscal year 1998 (after October 1, 1997). The construction wastes will be placed in a dump truck and hauled to the CFA landfill.

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in section 4 above.

Name: P. B. Wells Signature: P B Wells Date: 9/5/97

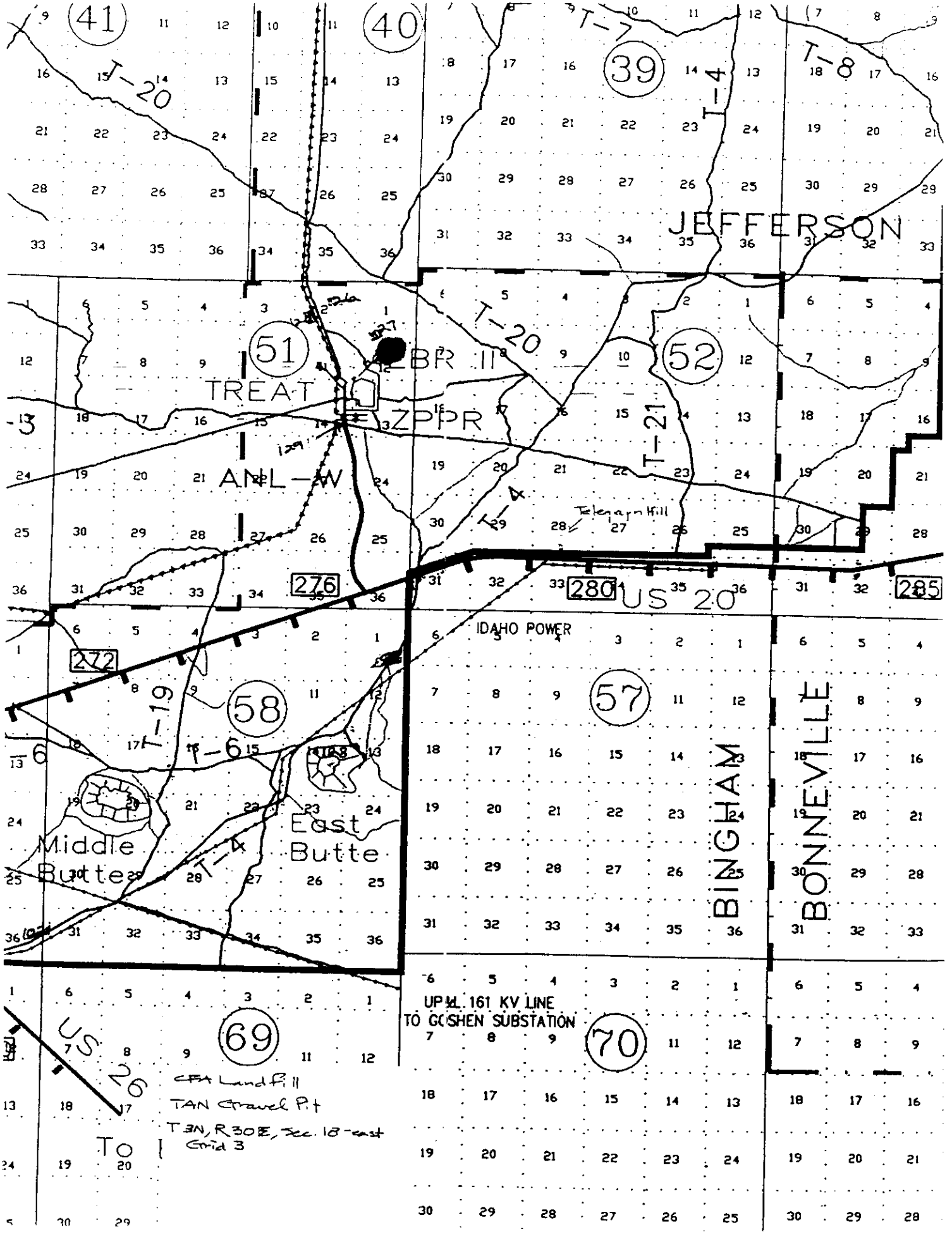
Part C (to be completed by DOE WAG Manager)

7. DOE WAG Manager Concurrence:

_✓_ Concur with the recommendation.
____ Do not concur with the recommendation. Explanation follows:

Name: W. Gregory Burns Signature: Date: 9-5-97

FFA/CO Project Managers' concurrence/non-concurrence will be documented in the tele-conference meeting minutes.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TREAT
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T-21
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Telegram Hill
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US 20
285
IDAHO POWER
272
58
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T-19
T-6
Middle Butte
East Butte
BINGHAM
BONNEVILLE
69
70
US 26
UP&L 161 KV LINE
TO GOSHEN SUBSTATION
CFA Landfill
TAN Gravel Pit
T3N, R30E, Sec. 18 - east
Grid 3
To I

Site 120 - Rubble pile north of TREAT.

ATTACHMENT B

NEW SITE IDENTIFICATION FORM

Part A (to be completed by observer)

1. Person initiating report: Mona Dunihoo, Jim Lane Phone: 526-5231
   Designated contractor WAG Manager: Pete Wells Phone: 533-7152
   Date initiated: October 17, 1994

2. Site Title: Rubble pile north of TREAT

3. Describe the conditions observed that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition, and date observed. A location map and/or diagram should be included to help with the site visit.

   Approximate legal description of this site is T3N, R32E, Sec. 2. Approximately one mile north of TREAT, underneath the electrical power lines is a small gravel mound containing some concrete block and wood. The area looks like a construction debris dump area. See attached map and 1997 ANL-W photos L9776e and L9776f.

Part B (to be completed by Contractor WAG Manager)

4. Recommendation:

   _____ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the FFA/CO Action Plan. Proposed OU assignment is included in the FFA/CO. OU_____.

   X This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation, and should NOT be included in the FFA/CO Action Plan.

5. Basis for the recommendation:

   This site was identified by aerial reconnaissance conducted by representatives from EG&G for the Environmental Baseline Survey. ANL-W has conducted two walk-throughs of the area along with photographs, radiation surveys, and industrial hygiene monitoring. The area contains numerous construction wastes including; washed gravel, concrete block, red-concrete, scrap metal, clay tile, wood scrap, and nuts and bolts. All of the wastes that remain in the site appear to be old construction type wastes with no known hazardous wastes and are therefore excluded as a FFA/CO Waste Management Site as defined in Attachment C of the *Inclusion of New Sites Under the INEL Federal Facility Agreement and Consent Order* dated June 24, 1994. However, ANL-W has scheduled a cleanup of the site with the Plant Services Laborers

for the first quarter of fiscal year 1998 (after October 1, 1997). The construction wastes will be loaded with a front-end-loader and placed in a dump truck and hauled to the CFA landfill.

6 Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in section 4 above.

Name: P.D. Wells Signature P D Wells Date: 9/5/97

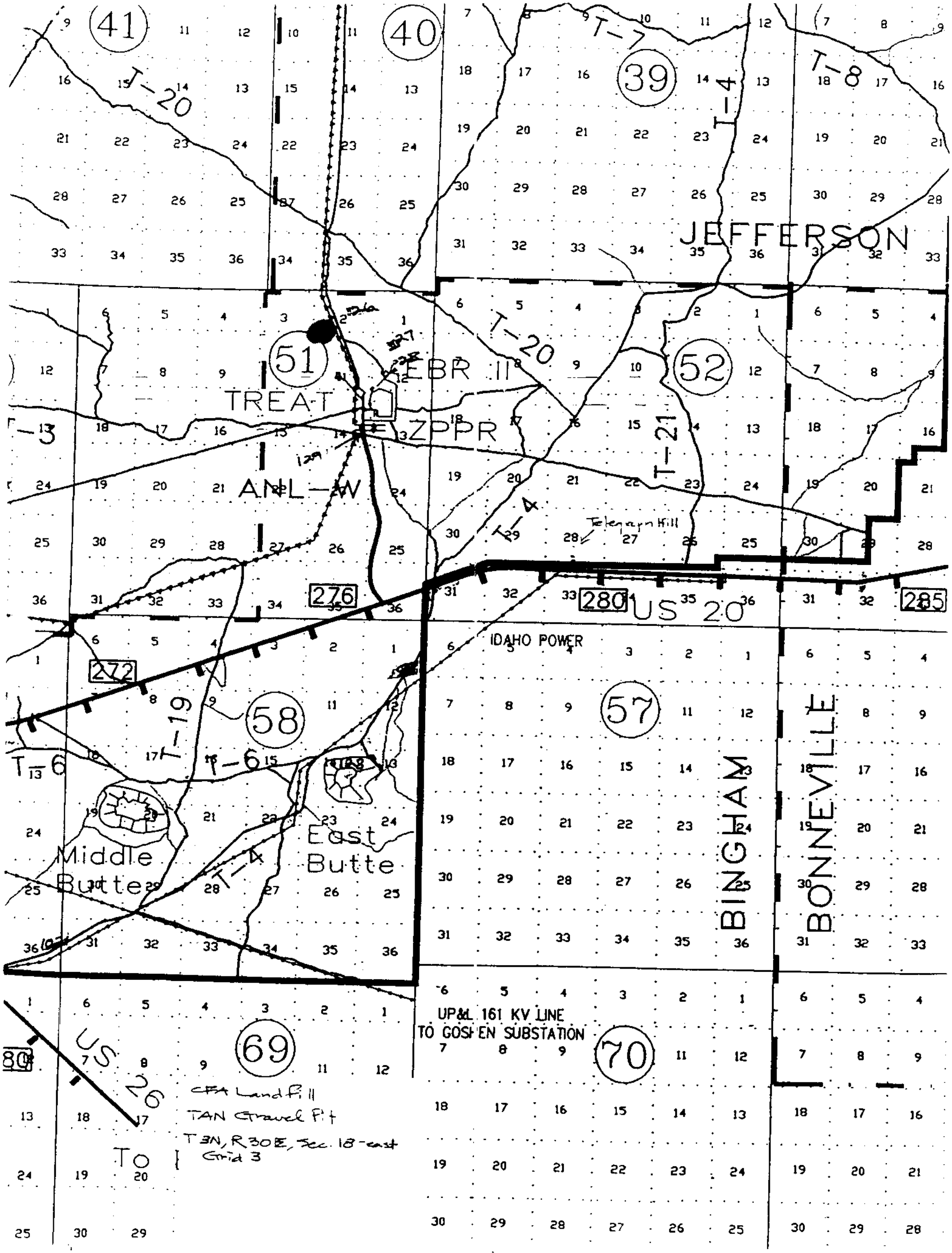
Part C (to be completed by DOE WAG Manager)

7 DOE WAG Manager Concurrence:

_✓_ Concur with the recommendation.
____ Do not concur with the recommendation. Explanation follows:

Name: William Gregory Bass Signature: W. Gregory Bass Date: 9-5-97

FFA/CO Project Managers' concurrence/non-concurrence will be documented in the tele-conference meeting minutes.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